

there must be a reasonable expectation of success. Finally, the combination must teach each and every claimed element. In the present case, claims 1 and 2 are not rendered unpatentable over the combination of Lee, Sasaki, and Min because the Examiner fails to establish a *prima facie* case of obvious as discussed below.

Independent claim 1 defines a structure for mounting an inverter in a liquid crystal display device. The structure includes, *inter alia*, an inverter electrically connected to a lamp, a case surrounding the liquid crystal display module, and at least one bracket arranged on a bottom surface of the case for connecting the inverter to the case.

In rejecting claim 1, the Examiner asserts that Lee discloses a mold frame comprising an inverter supporting bar for supporting an inverter, Sasaki discloses a metal fitting electrically connecting a fluorescent tube to an inverter unit, and Min discloses a flat panel display with a bracket/bar placed on the bottom surface of the case/housing. Therefore, the Examiner concludes that it would have been obvious to one skilled in the art to include “the required inverter/lamp assembly and the bracket/bar placement in the required location in Lee as taught by Sasaki and Min” in order to have a liquid display device “with better functionality.” This conclusion is unfounded for the following reasons.

Nowhere in Lee, Sasaki, or Min is there any disclosure or suggestion of at least one bracket arranged on a bottom surface of the case for connecting the inverter to the case. To the contrary, Lee discloses connecting the inverter to a frame or module such the converter is located at a side surface of the display (see Fig. 3, items 262 and 264 of Lee). Sasaki discloses locating the converter at a rear surface of the display. (See Fig. 1, item 10 of Sasaki). Min discloses attaching a bracket to a bottom surface of the case, however nowhere in Min is there any disclosure or suggestion of the bracket including means for attaching a converter. Since Lee,

Saski, and Min each fail to disclose or suggest a bracket as claimed, the combination of three references cannot possibly disclosure or suggest said feature. Therefore, even if one skilled in the art were motivated to combine Lee, Sasaki, and Min, the combination would still fail to render claim 1 unpatentable for at least the reason that the combination fails to disclose each and every claimed element.

Claim 2 depends from independent claim 1. Therefore, claim 2 is patentably distinguishable over the combination of Lee, Sasaki, and Min for at least those reasons presented above with respect of claim 1. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection of claims 1 and 2 under 35 U.S.C. §103(a).

The application is in condition for allowance. Notice of same is earnestly solicited. Should the Examiner find the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

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Reply to non-final Office Action dated December 3, 2004

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: April 4, 2005.

Respectfully submitted,

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